

Taly Goody, Esq.
Wyoming Bar No.: 8-6737
Greyson M. Goody, Esq.
GOODY LAW GROUP
58 Malaga Cove Plaza
Palos Verdes Estates, CA 90274
Telephone: (310) 893-1983
Email: taly@GoodyLawGroup.com
greyson@GoodyLawGroup.com
Attorneys for Plaintiffs

T. Michael Morgan, Esq*
Florida Bar No.: 062229
Rudwin Ayala, Esq*
Florida Bar No.: 84005
MORGAN & MORGAN, P.A
20 N. Orange Ave, Suite 1600
Orlando, FL 32801
Telephone: (407) 420-1414
Email: mmorgan@forthepeople.com
rayala@forthepeople.com
** Pro Hac Vice Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH,
Individually and as Parent and Legal
Guardian of W.W., K.W., G.W., and
L.W., minor children, and
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

**PLAINTIFFS' MOTION TO EXCUSE COUNSEL
FROM ATTENDING THE FINAL PRETRIAL CONFERENCE**

Pursuant to Local Rule 16.2(a), Plaintiffs, through undersigned counsel, respectfully submit this motion requesting that the Court excuse attorneys Taly

Goody (local counsel) and T. Michael Morgan, from attending the Pretrial Conference scheduled for February 11, 2025, at 2:00 p.m. In support of this motion, Plaintiffs state as follows:

1. Mr. Rudwin Ayala is lead counsel and has been actively involved in this case throughout the entire litigation. Mr. Ayala has consulted with opposing counsel and there were no objections to the motion sought. The parties conferred and agreed that attorney Rudwin Ayala will attend the Pretrial Conference on behalf of all Plaintiffs. All other counsel listed above will be excused from participation in the conference. This agreement reflects the mutual consent of both parties and ensures proper representation at the hearing.

2. Accordingly, Plaintiffs respectfully request that the Court issue an order excusing attorneys Taly Goody and T. Michael Morgan, from attending the Pretrial Conference scheduled for February 11, 2025. A proposed order is attached for the Court's consideration.

Date: January 29, 2025

Respectfully Submitted,

/s/ Rudwin Ayala

RUDWIN AYALA, Esq.*

Florida Bar No.: 84005

MORGAN & MORGAN, P.A

1700 Palm Beach Lakes Blvd, Suite 500

West Palm Beach, FL 33401

Telephone: (561) 764-2220

Emails: rayala@forthepeople.com

sleroy@forthepeople.com

Admitted Pro Hac Vice

And,

/s/ Taly Goody

TALY GOODY, ESQ.

Wyoming Bar No.: 8-6737

GREYSON M. GOODY, ESQ.

GOODY LAW GROUP

58 Malaga Cove Plaza

Palos Verdes Estates, CA 90274

Telephone: (310) 893-1983

Emails: taly@GoodyLawGroup.com

greyson@GoodyLawGroup.com

Local Counsel

/s/ T. Michael Morgan

T. MICHAEL MORGAN, ESQ.*

Florida Bar No.: 062229

Kentucky Bar No.: 94856

MORGAN & MORGAN, P.A

20 N. Orange Ave., Suite 1600

Orlando, FL 32801

Telephone: (407) 420-1414

Emails: mmorgan@forthepeople.com

akelseyflowers@forthepeople.com

Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 29, 2025, a true and correct copy of the foregoing was electronically served to all counsel of record.

Counsel for Defendants:

Eugene M. LaFlamme – elaflamme@MLLlaw.com

Jared B. Giroux – jgiroux@MLLlaw.com

Jillian L. Lukens – jlukens@MLLlaw.com

/s/ Rudwin Ayala

RUDWIN AYALA, ESQ.*

MORGAN & MORGAN, P.A

Florida Bar No.: 84005

**Admitted Pro Hac Vice*